



D. Scott Neal

I N C O R P O R A T E D

Privacy Policy: Protecting Your Privacy and Security

The SEC's Regulation S-P (Privacy of Consumer Financial Information), which was adopted to comply with Section 504 of the Gramm-Leach-Bliley Act, requires investment advisers to disclose to their Clients, who are Natural Persons, its policies and procedures regarding the use and safekeeping of client records and information.

At D. Scott Neal, Inc., protecting your privacy and security is top priority. We honor our relationship with you as a sacred trust. The trust begins with the information you choose to share with us. As part of that trust, we are committed to the responsible management, use and protection of your personal information. D. Scott Neal, Inc. protects the security and confidentiality of the personal information we have and make reasonable efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Information is collected from Clients at the inception of their accounts and occasionally thereafter, primarily to assist in providing Clients with requested services. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information and we do everything reasonably possible to maintain that trust.

Information Collected

Regulation S-AM ("Reg S-AM") prohibits a registered investment adviser from using information about an individual consumer that has been obtained from an affiliated entity for marketing purposes unless the information-sharing practices have been disclosed and the consumer has not opted out.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

Name and address	• Assets
E-mail address	• Income
Phone number	• Account balance
Social security or taxpayer identification number	• Investment activity
Accounts at other institutions	

In addition, we may collect non-public information about you from the following sources:

- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

We do not sell your non-public personal information to anyone. We strive to maintain complete confidentiality of your personal information, in accordance with Regulation S-P adopted by the Securities and Exchange Commission. This includes records we collect from applications and other forms, your transactions, and in communications you have with us pertaining to your personal background, investment objectives, financial situation, investment holdings, account numbers, account balances and more. This information may include your name, address, Social Security number, bank or other financial

account information, tax and other legal status.

The only exceptions include the following: (1) D. Scott Neal, Inc. may disclose information to our affiliates, your other professional advisors and/or service providers (e.g., attorney, accountant, banker, insurance agent, account custodian, etc.) if you have authorized such disclosure for your everyday business purposes such as to process transactions, or to otherwise maintain your account; or (2) D. Scott Neal, Inc. is specifically required to do so by law, judicial or regulatory processes; (3) D. Scott Neal, Inc. may share some or all of the information we collect, in order to conduct company business, with unaffiliated third-parties that perform services for us on our behalf, such as vendors we hire to provide support for our services, or our professional advisors (e.g. consultants, accountants, and attorneys). These companies act on our behalf and are contractually obligated to keep the information we provide them confidential and to use the information only for the purposes authorized; (4) D. Scott Neal, Inc. may otherwise be permitted to do so in accordance with the parameters of Regulation S-P. We freely share information with your current legal spouse. We consider your current husband or wife to be a "joint client." It is your responsibility to notify us promptly of any marital status changes and/or electronic mail address changes; or (5) As a registered investment advisor, D. Scott Neal, Inc. is subject to periodic, routine inspections by the Securities Exchange Commission. In these inspections, it is typical for examiners to request personal information about our partners.

Any disclosure of information in a document that has been completed and submitted by you to D. Scott Neal, Inc. to facilitate a business relationship between you and a third party provider (i.e., banker, account custodian, insurance company, etc.) will automatically be considered as having been authorized by you with respect to the non-affiliated third party service provider. This information may be contained in any document completed and/or executed by you for D. Scott Neal, Inc. (i.e. advisory agreement, application, client information form, etc.).

Each individual or party affiliated with D. Scott Neal, Inc. is aware of this Privacy Policy, and has agreed to comply with it. Members of the firm shall have access to information to the extent necessary to perform the firm's services and to comply with regulatory requirements.

D. Scott Neal, Inc. restricts access to non-public personal information about clients to employees who need to know that information to provide services to you or otherwise act in furtherance of our business. Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. As such, we limit employee access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law and discreet and proper business purposes in connection with the servicing and management of your account. These measures include computer safeguards and secured files. We do not sell personal information about our clients for any purpose. We maintain physical, procedural and electronic safeguards to protect your personal information from unauthorized access and we use security measures that comply with federal law in an effort to protect the information from access by unauthorized parties.

For unaffiliated third parties that require access to your personal information, including financial service companies, consultants and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law. Additionally, we conduct annual reviews of all our third-party service providers. We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.

Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board and AICPA Code of Ethics. After this required period of record retention, all such information will be destroyed.

If you close your account(s) or become an inactive client, D. Scott Neal, Inc. will continue to adhere to the privacy practices as described in this notice. If at any time it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice so that you will have the opportunity to opt out of such disclosure.

If, for any reason, you feel our records contain inaccurate personal information, please notify us and we will promptly update or correct our records.

In Summary

Keeping your information confidential is extremely important. We exercise our best judgment in how we use this information. Some firms may sell financial information about their customers, but D. Scott Neal, Inc. does not. We work on behalf of your best interests. We only give your information to other professionals when the information is needed to facilitate the work for you. "In the best interest of our client" is a guiding principal for D. Scott Neal, Inc.

D. Scott Neal, Inc. Fiduciary Oath

The advisor shall exercise his/her best efforts to act in good faith and in the best interests of the client. The advisor provides written disclosure to the client prior to the engagement of the advisor, and thereafter throughout the term of engagement, of any conflicts of interest which will or reasonably may compromise the impartiality or independence of the advisor.

The advisor, or any party in which the advisor has a financial interest, does not receive any compensation or other remuneration that is contingent on any client's purchase or sale of a financial product. The advisor does not receive a fee or other compensation from another party based on the referral of a client or the client's business.



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